

ESTTA Tracking number: **ESTTA777359**

Filing date: **10/18/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92061934
Party	Defendant Townsquare Commerce, LLC
Correspondence Address	TOWNSQUARE COMMERCE LLC 1851 N GREENVILLE AVE, STE 100 RICHARDSON, TX 75081 UNITED STATES tmhou@conleyrose.com
Submission	Response to Board Order/Inquiry
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Date	10/18/2016
Attachments	Response_to_Board_s_Inquiry.pdf(14955 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of U.S. Trademark Reg. No. 3,895,241 (SEIZE THE DEAL)  
Registered: December 21, 2010

GROUPON, INC.	§	
	§	
Petitioner,	§	
	§	
v.	§	Cancellation No. 92061934
	§	
TOWNSQUARE COMMERCE, LLC,	§	
	§	
Registrant.	§	
	§	

**REGISTRANT’S RESPONSE TO BOARD INQUIRY  
RE: STATUS OF CIVIL ACTION**

Registrant Townsquare Commerce, LLC (“Registrant” or “Townsquare”), by and through its undersigned counsel, hereby submits this Response to the Board Inquiry regarding the status of *Townsquare Commerce, LLC v. Groupon, Inc.*, Civil Action 3:15-cv-1870-B (“Federal Action”), pending in the United States District Court for the Northern District of Texas. The parties have been diligently proceeding with the case and are currently in the discovery phase of the litigation. Fact discovery ends on November 8, 2016. Registrant served its expert reports on September 15, 2016. Petitioner’s expert reports are due on October 17, 2016. The case is on track to trial in mid-April 2017. The parties, however, are scheduled for mediation on November 1, 2016. For the Board’s convenience, we have reproduced the amended scheduling order from the Federal Action below:

<b>PLAINTIFF'S EXPERT DESIGNATION &amp; REPORT</b>	<b>SEPTEMBER 15, 2016</b>
<b>DEFENDANT'S EXPERT DESIGNATION &amp; REPORT</b>	<b>OCTOBER 17, 2016</b>
<b>REBUTTAL EXPERT DESIGNATION</b>	<b>30 DAYS AFTER DISCLOSURE MADE BY OTHER PARTY</b>
<b>DEADLINE FOR EXPERT OBJECTIONS</b>	<b>FEBRUARY 16, 2017 (BUT NOT BEFORE DISPOSITIVE MOTIONS DEADLINE)</b>
<b>DEADLINE FOR COMPLETION OF MEDIATION</b>	<b>NOVEMBER 15, 2016 (JOINT REPORT NAME MEDIATOR DUE 35 DAYS FROM TODAY)</b>
<b>DEADLINE FOR DISPOSITIVE MOTIONS</b>	<b>NOVEMBER 30, 2016</b>
<b>DEADLINE FOR COMPLETION OF DISCOVERY</b>	<b>NOVEMBER 8, 2016</b>
<b>DEADLINE FOR PRETRIAL DISCLOSURES AND OBJECTIONS</b>	<b>MARCH 3, 2017 OBJECTIONS DUE 14 DAYS THEREAFTER</b>
<b>DEADLINE FOR PRETRIAL MATERIALS (PRETRIAL ORDER ETC)</b>	<b>APRIL 3, 2017</b>
<b>EXCHANGE OF EXHIBITS</b>	<b>TWO DAYS PRIOR TO THE PRETRIAL CONFERENCE</b>
<b>PRETRIAL CONFERENCE</b>	<b>APRIL 14, 2017 AT 10:00 AM</b>
<b>TRIAL DATE</b>	<b>APRIL 17, 2017</b>

DATE: October 18, 2016

Respectfully Submitted,

/s/ Darlene Ghavimi

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*Attorneys For Townsquare Commerce, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing Registrant's Response to Board Inquiry re: Status of Civil Action has been served on counsel of record for Groupon by e-mail, by agreement, on October 18, 2016.

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/s/ Darlene Ghavimi

Darlene Ghavimi